

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF SOUTH CAROLINA
 CHARLESTON DIVISION

BMW of North Charleston, LLC,)	Civil Action No. 2:18-cv-01872-RMG
and Riverland, LLC,)	
)	
Plaintiffs,)	
)	
vs.)	<u>DEFENDANTS', QUALITY</u>
)	<u>EXTERIORS GROUP, LLC, AND</u>
Faulk, LLC,)	<u>DONNIE HAWKINS', RESPONSES TO</u>
)	<u>LOCAL RULE 26.01</u>
Defendants.)	<u>INTERROGATORIES</u>
)	

The defendants, Quality Exteriors Group, LLC, and Donnie Hawkins, by and through the undersigned counsel, respond to Local Rule 26.01 Interrogatories as follows:

1. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: The defendants, Quality Exteriors Group, LLC, and Donnie Hawkins, are not aware of any persons or legal entities who may have a subrogation interest in this claim at this time.

2. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: A jury trial has been requested given that the issue of liability, causal relationship, and damages are in dispute.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (a) each publicly owned company of which it is a parent,

subsidiary, partner, or affiliate; (b) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (c) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: The defendants, Quality Exteriors Group, LLC, and Donnie Hawkins, are not publicly owned companies.

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: The alleged incident arises out of a construction project in Charleston County. Therefore, the Charleston Division of the United States District Court is the appropriate Division for the trial of this matter.

5. Is this action related in whole or in part to any other matter filed with this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges?

RESPONSE: The defendants, Quality Exteriors Group, LLC, and Donnie Hawkins, are not aware of any other related matter.

6. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: The defendants, Quality Exteriors Group, LLC, and Donnie Hawkins, are properly identified.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Aside from the defenses raised in the Answer, the defendants, Quality Exteriors Group, LLC, and Donnie Hawkins, are currently unaware of the identity of any other party or parties who should be named in this litigation.

(Signature page to follow.)

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, L.L.C.

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